

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

KATHLEEN ABREY,

Plaintiff,

v.

STEAMPUNK HOLDINGS, INC., *et al.*,

Defendants.

Civil Action No.: 1:22-cv-00654-MSN-LRV

DEFENDANTS' TRIAL EXHIBIT LIST

Defendants Steampunk Holdings, Inc. (“Holdings”) and Steampunk, Inc. (“Steampunk”) (collectively “Defendants”), through counsel, in accordance with the Court’s May 19, 2023 Order (Dkt. No. 90), hereby provides their list of trial exhibits, other than those they intend to use for rebuttal or impeachment purposes.

Exhibits¹

Exhibit No.	Bates No.	Date	Description
1		05/22/2019	*Article: Trio of Fed. Gov’t Tech. Veterans, Harllee Dep. Ex. 9
2	SHI00510262	02/15/2019	*M. Warren Restriction Letter
3	SHI00510265	02/22/2019	*D. Ashley Restriction Letter
4	SHI00510267	05/01/2019	*B. Cole Restriction Letter
5	SHI00510270	05/09/2019	*K. Abrey Restriction Letter
6	SHI00056579	02/25/2020	*Abrey - Restricted Stock Grant Notice
7	PL000228	02/23/2021	*Stock Repurchase Notice
8	SHI00106623	02/14/2020	*Bonus Letter
9	SHI00381360	03/17/2020	*Abrey text re: return to work
10	SHI00446027	03/17/2020	*Response to Abrey text re: return to work
11	SHI00074384	04/08/2020	*Email re: Kate’s return
12	SHI00499255	04/09/2020	*Email re: Kate’s return
13	SHI00070555	05/01/2020	*Email re: Reference Materials

¹ Exhibits with an asterisk were initially identified in Defendants’ Rule 26(a)(3) disclosures (Dkt. No. 88) to which Plaintiff lodged no objection.

14	SHI00032921	07/24/2019	*Email re: Matt
15	SHI00141351	05/04/2020	*Slack message re: follow-up meeting
16	SHI00443002	03/04/2020	*Email re: Kate's return and leave
17	SHI00139084	04/20/2020	*Email re: DHS
18	SHI00040581	05/08/2020	*Email re: Steampunk Focus Areas
19	SHI00152682	05/05/2020	*Email re: What's Best for Steampunk
20	SHI00161111	05/13/2020	*Email re: Delivery Excellence – some thoughts
21	SHI00387637	05/19/2020	*Email re: A few updates/coaching
22	SHI00440407	07/28/2020	*Email re: Tuesday 28 summary
23	SHI00028825	08/04/2020	*Email re: Org Thinking
24	SHI00166890	08/10/2020	*Email re: Leadership Team Topic
25	SHI00037155	09/01/2020	*Email re: updated forecast for DHS
26	SHI00460269	09/10/2020	*Email re: Follow-up
27	SHI00152263	09/30/2020	*Email re: last week's conversation
28	SHI00054823	11/24/2020	*Abrey Performance Review
29	SHI00127880	11/24/2020	*Email re: A few observations from our call today
30	SHI00028444	12/08/2020	*Email re: Revenue planning for 2021
31	SHI00029769	12/02/2020	*Email re: weekly catchup
32	SHI00168227	12/02/2020	*Email re: weekly catchup
33	SHI00465389	12/03/2020	*Email re: sharing BoD presentation
34	SHI00036368	12/08/2020	*Email re: Few topics to discuss tomorrow
35	SHI00446578	12/16/2020	*Email re: Kyle Offer Ideas
36	SHI00040162	12/30/2020	*Email: Who's ready to rumble, Q1 forecast
37	SHI00076218	12/16/2020	*Email re: Bucket of business
38	SHI00027459	01/03/2021	*Email re: DHS plan
39	SHI00456392	01/04/2021	*Email re: a few thoughts
40	SHI00153874	01/06/2021	*Email re: for our next discussion
41	SHI00035364	01/13/2021	*Email re: Our catch up
42	SHI00022832	01/13/2021	*Call request
43	SHI00370910	01/14/2021	*Transcript of Warren-Abrey Call
44	SHI00195700	10/16/2019	*Email re: Savannah call to action
45	SHI00059400	02/09/2020	*Email re: Tampa trip itinerary
46	SHI00063110	12/10/2020	*Email re: Wedge Recap 2020
47	SHI00035759	12/28/2020	*Email re: Who's ready to rumble
48	SHI00106095	07/02/2021	*Abrey EEOC Charge (Abrey Dep. Ex. 4)
49		03/11/2022	*Abrey EEOC Right to Sue
50		03/17/2023	*Plaintiff's Amended Responses to Defendant's Requests for Admission (Abrey Dep. Ex. 1)
51		03/15/2023	*Plaintiff's Amended Responses to Interrogatories (Abrey Dep. Ex. 2)
52	SHI00151975	01/13/2021	*Email re: Portfolio Comparison, with native file (Abrey Dep. Ex. 15)
53	SHI00128420	01/04/2021	*Email re: Jacquelyn Brioux
54			*Brioux Leave Request (Abrey Dep. Ex. 18)

55	SHI00056671	01/07/2021	*Email re: Response from Jacquelyn
56	SHI00128461	01/11/2021	*Email re: RSG – Jacquelyn Brioux
57	SHI00327474	01/11/2021	*Email re: RSG – Jacquelyn Brioux
58	SHI00128994	01/12/2021	*Teams Meeting re: Jacquelyn Brioux
59	SHI00457254	01/13/2021	*Email re: Jacquelyn Brioux
60	SHI00028762	01/13/2021	*Email re: Jacquelyn Brioux
61	SHI00134494	01/13/2021	*Slack Messages Re: Jacquelyn Brioux
62	SHI00128405	01/27/2021	*Email re: Jacquelyn Brioux Declining Job Offer
63		04/03/2023	*Plaintiff’s Second Supplemental Interrogatory Answers (Abrey Dep. Ex. 3)
64	SHI00058090	12/14/2020	Email re: Monday’s Forecast Meeting
65	SHI00045371	12/18/2020	Email re: Wedges in Review
66	SHI00090377	11/25/2020	Email re: Catch-up Tomorrow
67	SHI00168227	12/2/2020	Email re: Weekly Catch-up Topics
68	SHI00442872	11/11/2020	Email re: Revenue Scenario Planning
69	SHI00438507	10/20/2020	Email re: Onboarding Ideas
70	SHI00413403	10/20/2020	Email re: Recompete Thoughts – early morning ruminations
71	SHI00385172	10/20/2020	Email re: 2 other thoughts (hence my call)
72	SHI00444260	10/16/2020	Email re: Show me the \$\$?!
73	SHI409562	10/16/2020	Email re: Show me the \$\$?!
74	SHI00095661	11/6/2020	Email re: A little weekly retro...
75	SHI00505112	05/5/2020	Email re: 1 on 1 with Nick
76	PL000740	03/6/2021	Email re: Steampunk
77			2020 Performance evaluation of David Wolf
78	Ashley Dep. Ex. 3		2020 Performance Evaluation of Diane Ashley
79			2020 Performance Evaluation of Matt Reeves
80	SHI00106417	04/30/2019	SE Solutions Employee Handbook
81	SHI00106479	10/2/2019	Steampunk Employee Handbook
82	SHI00036853	12/13/2019	Meeting invite re: DHS Staffing Meeting
83	SHI00448947	12/18/2019	Email re: Measuring success
84	SHI00033061	12/30/2019	Email re: Ideas welcome on program management
85	SHI00029008	07/11/2019	Meeting invite re: Sync – strategy #2
86	SHI00037799	07/14/2019	Email re: Agenda for Monday’s meeting
87	SHI00069681	05/31/2019	Email re: Sector weekly P&L Review
88	SHI00028211	05/31/2019	Email re: Pipeline Review with Harlee
89	SHI00467786	11/14/2019	Meeting Invite re: Maximizing the Business
90	SHI00060344	11/20/2019	Meeting invite re: Catch up – metrics & mtg prep
91	SHI00024106	12/3/2019	Meeting invite re: Orchestrating SPEED next steps
92	SHI00152932	07/21/2020	Email re: Rumors swirl at USCIS about Steampunk
93	SHI00058506	09/9/2020	Email re: Touch Point – for discussion

94	SHI00138600	3/3/2020	Email re: Kate's return
95	SHI00510097 – 105		Design Intelligence Presentation
96	SHI00510106 – 09	04/30/2020	Do Your Job presentation
97	SHI00510111 – 13	01/27/2020	Email re: Forecast of bookings and FTEs
98	SHI00510116- 20	04/28/2020	Email re: Q2 – We are out of the gates!
99	SHI00510123- 36	02/17/2020	Email re: DHS Offsite
100	SHI00510137	01/22/2020	Email re: Offsite Basic Agenda
101	SHI00510140	03/12/2020	Email re" Q1 ... coming down the home stretch
102	SHI00510142	04/23/2020	Email re: Bookings Update
103	SHI00510146 – 49	02/24/2020	Email re Q1 Net New Forecast and FTE summary
104	SHI00510153 - 72	02/14/2020	Email re: Civilian Offsite
105	SHI00441270 – 92	09/24/2020	Email re: Target Exercise
106	SHI00408289	04/07/2020	Email re: May 1 st !
107	SHI00145260	03/04/2020	Email re: Kate's Return Date
108	SHI00106538	07/1/2020	Paternity and Maternity Benefits
109	SHI00508617	06/30/2020	Email re: Paid Maternity/Paternity (Parental) Leave Benefit
110	SHI00184481	03/12/2021	Email re: New Expanded Steampunk Maternity Leave Benefit
111	SHI00170160	01/11/2021	Email re: cost cut
112	SHI00508647	02/17/2020	Email re: Steampunk Comms for Tomorrow, with attached press release
113	Demonstrative		History of Max Licht Reporting Relationship
114	Demonstrative		Paid parental Leave Policy Evolution
115	Demonstrative		Expiration of AFS Non-Compete Restrictions at Steampunk
116	Demonstrative		2020 Annual Performance Evaluation Comparison
117	Demonstrative		2020 Kate Abrey Direct Reports Annual Performance Evaluation Comparison
118	Demonstrative		Performance by Quarter May 2019 – January 2021
119	Demonstrative		Performance by Quarter After May 2020
120	Demonstrative		Kate Abrey Portfolio Q4 2019 – Q1 2021 Net New Performance (Forecast v. Actual)

121	Demonstrative		Kate Abrey & Nick Trczinski Q4 2019 – Q1 2021 Portfolio Net New Performance (Forecast v. Actuals) Side-by-Side Comparison
122	Demonstrative		All Teams Q4 2019 – Q1 2021 Portfolio Net New Performance (Forecast v. Actuals) Side-by-Side Comparison
123	Demonstrative		2020 Revenue Totals by Agency

Respectfully submitted,

Dated: July 31, 2023

JACKSON LEWIS P.C.

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2023, I electronically filed the foregoing *Defendants' Trial Exhibit List* with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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